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ATTORNEY FOR DEBTOR(S)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:

**JORIS LYNN DIXON
LACHEKA CHONTA WINFREY
Debtor**

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CASE NO. 24-42820-MXM-13

HEARING DATE: MARCH 20, 2025

HEARING TIME: 8:30 a.m.

**DEBTOR'S RESPONSE TO TRUSTEE'S NOTICE OF INTENT TO DISMISS
DEBTOR'S CHAPTER 13 CASE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW **JORIS LYNN DIXON AND LACHEKA CHONTA WINFREY**, Debtor in the above-styled and numbered cause and in response to the Standing Chapter 13 Trustee's Notice of Intent to Dismiss Chapter 13 Case would respectfully show the Court, as follows:

1. The Debtor admits that they are currently delinquent in their Trustee payments.

The Debtor respectfully requests the court to not dismiss their case pursuant to the deadline to pay per the Notice of Intent to Dismiss.

2. Debtor would request that the Dismissal be delayed until March 20, 2025, to allow debtor time to bring the default current.

WHEREFORE, PREMISES CONSIDERED, Respondent prays that Trustee's Notice of Intent to Dismiss be denied and for such other and further relief in law and equity as the Court deems just.

Dated: February 21, 2025

Respectfully Submitted,

By: /s/ Christopher M. Lee
Christopher M. Lee
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 21, 2025, a true and correct copy of the foregoing Response to Trustee's Notice of Intent to Dismiss Chapter 13 Case was served on the following parties in interest by first class mail:

STANDING CHAPTER 13 TRUSTEE

Pam Bassel
7001 Blvd. 26, Suite 150
North Richland Hills, TX 76180

U.S. TRUSTEE

United States Trustee
William T. Neary
1100 Commerce, Room 976
Dallas, TX 75242

DEBTOR:

Joris Lynn Dixon
6721 Morning Crest Court
Arlinton, Texas 76002

/s/ Christopher M. Lee
Christopher M. Lee
State Bar No. 24041319
ATTORNEY FOR DEBTOR(S)